

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

RHONDA HALL,

Plaintiff,

V.

VERIZON COMMUNICATIONS, INC.,
and VERIZON NEW ENGLAND, INC.

Defendants.

Civil Action No. 3:05-cv-30002-MAP

**PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION TO
DISQUALIFY PLAINTIFF'S COUNSEL AND REQUEST FOR
SANCTIONS PURSUANT TO 28 U.S.C. § 1927**

The Plaintiff respectfully submits this opposition to the defendants' pending Motion to Disqualify Plaintiff's Counsel. The plaintiff further asserts that defendants' motion to disqualify plaintiff's counsel unreasonably and vexaciously multiplied the proceedings in this case, and respectfully requests that appropriate sanctions, including excess expenses and attorney's fees, be assessed directly against them pursuant to 28 U.S.C. § 1927.

Respectfully submitted,
PLAINTIFF RHONDA HALL
By her Attorney,

Dated: May 14, 2007

/s/ Hugh D. Heisler

Hugh D. Heisler
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CERTIFICATE OF SERVICE

I, Hugh D. Heisler, hereby certify that a true copy of the foregoing Opposition and Request for Sanctions was served electronically upon the attorney of record for the Defendants on May 14, 2007.

/s/ Hugh D. Heisler

Hugh D. Heisler